

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

IAN FREEMAN

No. 1:21-cr-00041-JL

**ASSENTED-TO MOTION FOR PROTECTIVE ORDER & PROPOSED BRIEFING
SCHEDULE FOR RESTITUTION HEARING**

In anticipation of the upcoming hearing on restitution, the Court asked the government to provide defense counsel with contact information for victims seeking restitution. The Crime Victims' Rights Act specifies that crime victims have a "right to be treated with fairness and with respect for the victim's dignity and privacy." The government, therefore, requests that the Court issue the attached proposed protective order limiting access to victim contact information to defense counsel, defense counsel's staff, and anyone directly engaged by defense counsel to assist in preparing for the restitution hearing including private investigators, and any other professional consultants participating in preparing the defense. The information shall not be provided to the defendant.¹ The defendant, through counsel, agrees to the proposed protective order.

¹ Five victims seeking restitution expressed strong objections to being contacted by defense and requested that their information be withheld from defense counsel. The government and defense counsel are working together to provide defense with an opportunity to question these victims, either through a deposition or by bringing these witnesses to testify at the hearing in December, while still protecting the victims' right to privacy. The parties anticipate being able to resolve these issues without involvement of the Court.

In addition, the parties request the opportunity to present additional briefing to the Court on restitution with the government's filing due by November 17, 2023 and any defense objection due by December 1, 2023.

Respectfully submitted,

JANE E. YOUNG
United States Attorney

Dated: November 2, 2023

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